

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

Ada MORALES,)	
)	
Plaintiff,)	
)	
v.)	
)	1:12-cv-00301-M
Bruce CHADBOURNE, <i>et al.</i> ,)	
)	
Defendants.)	

**JOINT STIPULATION OF DISMISSAL
UNDER FEDERAL RULE OF CIVIL PROCEDURE 41**

The parties have taken action to resolve this case without the need for further judicial involvement.

Accordingly, the parties jointly stipulate that the Court should dismiss this case without prejudice under Rule 41(a) of the Federal Rules of Civil Procedure.

Each party agrees to pay its own fees and costs associated with this case.

DATED: August 2, 2017

Respectfully,

By: /s/ Mark A. Ford
Laura Donovan (R.I. Bar No. 8333)
Mark A. Ford (pro hac vice)
WILMER CUTLER PICKERING HALE
AND DORR LLP
60 State Street
Boston, MA 02109
Tel.: (617) 526-6000
Fax: (617) 526-5000
Laura.Donovan@wilmerhale.com
Mark.Ford@wilmerhale.com

(Plaintiff's counsel continued on next page)

Jennifer Chang Newell (pro hac vice)
Cody H. Wofsy (pro hac vice)
ACLU FOUNDATION
IMMIGRANTS' RIGHTS PROJECT
39 Drumm Street
San Francisco, CA 94111

Counsel for Plaintiff

CHAD A. READLER
Acting Assistant Attorney General

WILLIAM C. PEACHEY
Director

COLIN A. KISOR
Deputy Director

By: /s/ Aaron S. Goldsmith
AARON S. GOLDSMITH
Senior Litigation Counsel
United States Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
202-532-4107
aaron.goldsmith@usdoj.gov

Counsel for Defendant Edward Donaghy

/s/ J. Max Weintraub
J. MAX WEINTRAUB
Senior Litigation Counsel
United States Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
202-305-7551
Email: jacob.weintraub@usdoj.gov

*Counsel for Defendants Bruce Chadbourne
and the United States of America*

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2017, I filed the foregoing with the Clerk of the United States District Court for the District of Rhode Island, using the CM/ECF system.

/s/ J. Max Weintraub

J. MAX WEINTRAUB

Senior Litigation Counsel

United States Department of Justice

Civil Division